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## **DISPOSAL OF FLUORESCENT LIGHT BALLASTS**

On August 28, 1998, new Federal requirements became effective regarding the disposal of some types of fluorescent light ballasts (ballasts). On August 13, 2000, Indiana adopted these requirements by incorporating the federal language into the new PCB Waste Management Regulations (329 IAC 4.1). Indiana also placed specific packaging requirement and landfill disposal restrictions on the disposal of all fluorescent light ballasts that contain PCBs at concentrations of 50 parts per million (ppm) or greater.

Prior to the regulatory changes mentioned above, neither the Federal nor the State regulations recognized the potential for PCBs to be found in the potting material of the light ballast. The potting material is the insulating material that fills the space between the functional parts of the ballast and the outer metal casing. Studies have demonstrated that more than 50% of the ballasts manufactured prior to July 1978 contain PCBs in the potting material that exceed 50 ppm.

Ballasts that contain PCBs in their potting material at concentrations of 50 ppm or greater are now regulated as "PCB Bulk Product Waste." Specific disposal requirements for these types of ballasts are found in the Federal Code of Regulations 40 CFR 761.62 and the Indiana regulations 329 IAC 4.1-4-1 and 329 IAC 4.1-13-1. Although these regulations don't, in general, prohibit disposal in a municipal solid waste landfill (MSWLF), Indiana regulations do prohibit disposal in MSWLFs units that are not designed to current Solid Waste standards found in the Indiana Solid Waste Regulation, 329 IAC 10-17. Furthermore, both federal and state regulations require:

- ballasts not be disposed where organic liquids are disposed  
(Note: organic liquids could include recirculated landfill leachate),
- the landfill collect its leachate and monitor for PCBs,
- releases outside the disposal unit must be cleaned up in accordance with 40 CFR 761.61.

Indiana has placed additional regulations on the disposal of these ballasts that include:

- placement in containers that meets U.S. Department of Transportation packaging requirements at 49 CFR 171 through 180,
- the interstitial space in the container must be filled with absorbent material capable of absorbing all liquid content of the ballast,
- and before compacting the container at the landfill a layer of solid waste, daily cover, or alternate daily cover must be placed over the container to prevent crushing of the container.

The IDEM has received several comments stating that the only way to determine whether fluorescent light ballasts contain PCBs at concentrations of 50 ppm or greater in their potting material would be to open the ballast to analyze the potting material. The IDEM is not requiring generators to test each ballast to determine if PCBs are present in the potting materials. The IDEM suggests the following in making this determination. First, assume the ballast contains PCBs in the potting material (unless the ballast is marked "No PCBs" or it was manufactured after July 1, 1999) and dispose as such. Second, conduct a survey of the manufacturer and the type of ballasts used in the building and contact the manufacturer to determine if they can provide information pertaining to the potting material, or utilize the survey to conduct random sampling to determine the presence of PCBs in this material.

If it is determined that PCBs are not present in the potting material and are only found in the capacitor of the ballast, and the ballast is non-leaking, then the ballast may be disposed of in a MSWLF designed to 329 IAC 10-17 standards. The previous disposal per day restriction without prior IDEM authorization was removed from the 329 IAC 4.1 regulations. However, please keep in mind that the disposal, packaging, and landfill leachate requirements listed above in paragraph 3 also apply to these types of ballasts.

One last item that one must keep in mind when disposing of light ballasts that contain PCBs. The Comprehensive Environmental Responsibility, Compensation and Liability Act (CERCLA) Section 102 requires anyone disposing of a pound or more of PCBs during a 24 hour period, to report the disposal as an environmental release to the National Response Center (800/424-8802). (Note: Approximately 12 to 16 ballasts that contain PCBs only in the capacitors could trigger this reporting requirement. Since PCB concentrations found in the potting material have been found to vary, an approximate ballast count can not be provided at this time.)

Authority to dispose does not eliminate or reduce the generator's liability for threats to human health or the environment should contamination occur during or following disposal. This Office strongly encourages generators to recycle non-leaking PCB ballasts. This process allows copper, steel and other valuable materials to be recovered from the ballast while the PCB containing portions are sent for proper disposal in TSCA approved incinerators or landfills. A list of recycling resources is attached.

If you have questions regarding this guidance please contact the Industrial Waste Section of IDEM at (317) 308-3131.

## **COMPANIES INVOLVED IN RECYCLING PCB BALLASTS FROM FLUORESCENT LIGHT FIXTURES**

The following is a list of companies providing recycling and disposal services for PCB ballast. This list was compiled from sources available at the time of compilation and should not be considered a comprehensive directory of all ballast recycling companies, nor an endorsement of those facilities. This list is an update provided by the Office of Industrial Waste Management, August 2003.

**BLR (Ballast & Lamp Recycling)**  
Indianapolis, IN 46225  
317/782-3228

**Salesco U.S.A.**  
Phoenix, AZ 1-800-556-5267

**Lighting Resources, Inc.**  
Pomona, CA 714/622-0881 or 800/57cycle  
Indianapolis - 317/888-3889

**Advanced Environmental Recycling Corp.**  
2591 Mitchell Avenue  
Allentown, PA 18103  
809/554-2372 Phone  
215/797-7696 Fax

**Advanced Environmental Technology Corp.**  
2176 Will Sweet Road  
Creedmoor, NC 27522  
800/322-8350 Phone  
919/528-4020 Fax

**Alta Resources Management Services**  
88-B Industry Avenue  
Springfield, MD 01104  
800/730-2582 Phone  
413/734-3475 Fax

**Ameriwest Environmental Services**  
6111 Carie Drive  
Valley View, OH 44125  
800/343-2179 Phone  
216/573-7120 Fax

**Ecoflo Inc.**

**Bethlehem Apparatus Co., Inc.**  
890 Front Street  
Hellertown, PA 18055  
610/838-7034 Phone  
610/838-6333 Fax

**BLR**  
21120 NW Parkway  
Marietta, GA 30067  
770/953-8000 Phone  
770/953-8100 Fax

**Carolina Environmental Assoc.**  
P.O. Box 963  
Burlington, NC 27216-0963  
910/229-0058 Phone  
910/229-0204

**Chemical Waste Management**  
2600 Delk Road  
Marietta, GA 30067  
800/541-5511 Ext. 775 Phone  
205/652-8289

**Dynex Environmental Inc.**  
4751 Mustang Circle  
St. Paul, MN 55112  
612/784-4040 Phone  
612/784-5397 Fax

**Eastern Environmental Tech. Inc.**  
47 Purdy Avenue  
Port Chester, NY 10573  
800/808-7227 Phone  
914/934-9659 Fax

**IBS Environmental**

2750 Patterson Street  
Greensboro, NC 27407  
910/855-7925 Phone  
910/855-4137 Fax

**EnviroCycle, Inc.**

P.O. Box 5367  
High Point, NC 27262-5367  
910/869-8836 Phone  
910/869-8704 Fax

**EnviroLight Inc.**

1967 W. 9<sup>th</sup> Street  
Riviera Beach, FL 33404  
407/840-9111 Phone  
407/844-0936 Fax

**Environmental Energy Group**

P.O. Box 50764  
Denton, TX 76205  
817/898-1291 Phone  
817/566-6315 Fax

**Environmental Options, Inc.**

P.O. Box 879  
Rocky Mount, VA 24151-0879  
540/483-3920 Phone  
540/483-3855 Fax

**Entergy Integrated Solutions**

7516 Precision Drive  
Raleigh, NC 27613  
919/596-7116 Phone  
919/596-7408 Fax

**Full Circle Ballast Recyclers**

509 Manida (Main Office)  
Bronx, NY  
800/775-1516 Phone  
718/328-4462 Fax

**NSSI Recovery Services**

5711 Etheridge Street  
Houston, TX 77087  
713/641-0391 Phone  
713/641-6153 Fax

**Ozark Solar**

314 East Spring

P.O. Box 1263  
Lenoir, NC 28645-1263  
800/768-9600 Phone  
828/396-2367 Fax

**Safety Kleen**

208 Watlington  
Industrial Road  
Reidsville, NC 27320  
336/342-6106 Phone  
336/361-6130 Fax

**Light Cycle**

1222 University Avenue  
St. Paul, MN 55104  
800/274-1309 Phone  
651/641-1422 Fax

**Lighting Resources, Inc.**

1522 E. Victory Street #2  
Phoenix, AZ 8540  
800/866-6818 Phone  
602/276-5432 Fax

**Mercury Tech. Inter.**

2591 Mitchell Avenue  
Allentown, PA 18103  
610/797-7608 Phone  
610/797-7696 Fax

**Mercury Tech. Of Minnesota, Inc.**

P.O. Box 13  
Pine City, MN 55063-0013  
320/629-7888 Phone  
320/629-7799

**Mercury Waste Solutions**

2112 NW Parkway  
Marietta, GA 30067  
770/953-8000 Phone  
770/953-8100 Fax

Neosho, MO 64850  
800/711-4756 Phone  
417/455-0290 Fax

**Quicksilver Environmental, Inc.**

8503 Sunstate Street  
Tampa, FL 33634  
800/376-7888 Phone  
813/249-1233 Fax

**Recyclights**

401 W. 86<sup>th</sup> Street  
Bloomington, MN 55420  
800/831-2852 Phone  
612/948-0627 Fax

**Salesco Systems, USA, Inc.**

<u>Corporate Office:</u>	<u>Branch Office:</u>
5736 W. Jefferson	3401 Brookglen
Phoenix, AR 85043	Garland, TX 75044
800/368-9095 Phone	972/675-9550 Phone
602/415-3030 Fax	972/675-9551 Fax

**Superior Lamp Recycling, Inc.**

P.O. Box 1323  
Fond-du-Lac, WI 54936  
(800) 932-6216 Phone  
(414) 248-9208 Fax

**USA Lights**

2007 W. CR C-2  
Roseville, MN 55113  
(651) 628-9370 Phone  
(651) 628-9371 Fax